

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants.

CIVIL NO: 3:22-cv-00049-NKM-JCH

**PLAINTIFFS' CROSS-MOTION TO COMPEL JOSHUA MAST, STEPHANIE MAST,
AND RICHARD MAST TO PRODUCE COMMUNICATIONS SENT OR RECEIVED
ON THE LIBERTY UNIVERSITY EMAIL SYSTEM**

Pursuant to Fed. R. Civ. P. 37, Plaintiffs, by counsel, respectfully move for an order compelling the production by Joshua and Stephanie Mast and Richard Mast (collectively, “the Mast Defendants”) of any and all emails sent or received on the Liberty University email system in the Mast Defendants’ possession, for the reasons and on the grounds set forth in the accompanying Memorandum (A) in Opposition to Motions to Quash and for Protective Order, and (B) in Support of Cross-Motion to Compel and its attachments.

Dated: March 11, 2024

Respectfully submitted,

/s/ Maya Eckstein

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of March, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

By: /s/ Maya M. Eckstein
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